

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

ELKAN ABRAMOWITZ  
RICHARD F. ALBERT  
ROBERT J. ANELLO\*  
KATHLEEN E. CASSIDY  
BENJAMIN S. FISCHER  
CATHERINE M. FOTI  
CHRISTOPHER B. HARWOOD  
LAWRENCE IASON  
BRIAN A. JACOBS  
TELEMACHUS P. KASULIS  
KAREN R. KING  
ROBERT M. RADICK\*  
JONATHAN S. SACK\*\*  
EDWARD M. SPIRO  
JEREMY H. TEMKIN  
RICHARD D. WEINBERG

565 FIFTH AVENUE  
NEW YORK, NEW YORK 10017  
(212) 856-9600  
FAX: (212) 856-9494

www.maglaw.com

WRITER'S CONTACT INFORMATION

espiro@maglaw.com  
212.880.9460

SENIOR COUNSEL  
PAUL R. GRAND  
COUNSEL  
JASMINE JUTEAU

ROBERT G. MORVILLO  
1938-2011  
MICHAEL C. SILBERBERG  
1940-2002  
JOHN J. TIGUE, JR.  
1939-2009

\*ALSO ADMITTED IN WASHINGTON, D.C.  
\*\*ALSO ADMITTED IN CONNECTICUT

October 4, 2022

**Via ECF**

Hon. George B. Daniels  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 1310  
New York, NY 10007

Re: Request for Oral Argument on Motion for a Stay of Nonmonetary Sanctions; *In re Terrorist Attacks on September 11, 2001*, No. 03-MDL-01570 (GBD) (SN)

Dear Judge Daniels:

I, together with Kirsch & Niehaus PLLC, represent the law firm Kreindler & Kreindler LLP ("K&K") in connection with the sanctions entered against K&K by Magistrate Judge Sarah Netburn on September 21, 2022, pursuant to Federal Rule of Civil Procedure 37(b)(2)(A). *See* Opinion & Order, Dkt. No. 8544. The monetary and nonmonetary sanctions entered against the law firm—including the removal of K&K from the Plaintiffs' Executive Committee after more than two decades at the helm of this multidistrict litigation—are effective "immediately." *Id.* at 65.

Earlier today, we filed a motion by order to show cause for a stay of the nonmonetary sanctions entered against K&K, pending resolution of its Rule 72(a) objections due October 21, 2022.

Pursuant to Section IV.D of your Honor's Individual Rules and Practices, I respectfully request oral argument on K&K's motion for a stay.

Respectfully submitted,

/s/ Edward M. Spiro

Edward M. Spiro